

# **EXHIBIT 15**

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MARYLAND

3 - - - - -x

4 MARYLAND SHALL ISSUE, :

5 INC., et al., :

6 Plaintiffs, : Civil Case No.

7 v. : 16-cv-3311-MJG

8 LAWRENCE HOGAN, et :

9 al., :

10 Defendants. :

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14 Deposition of ATLANTIC GUNS, INC.

15 By and through its Corporate Designee,

16 STEPHEN SCHNEIDER

17 Baltimore, Maryland

18 Tuesday, March 6, 2018

19 10:00 a.m.

20 Job No.: 178307

21 Pages: 1 - 75

22 Reported By: Janet A. Hamilton, RDR

1 question.

2 A Oh, I'm sorry.

3 Q Can you identify by name any of the  
4 customers who have told you that it took more than  
5 a month for them to get their HQL after the  
6 application was submitted?

7 A No, I cannot.

8 Q Let me show you what was previously marked  
9 in this case as Exhibit 2. This is a copy of the  
10 Amended Complaint that's been filed in the case.  
11 On page 2, paragraph number 3, there is an  
12 allegation that Maryland's Handgun Qualification  
13 License is lengthy, expensive, and then  
14 parentheses, totaling hundreds of dollars in fees,  
15 costs and travel, not counting time off from work.

16 Other than the costs that you've already  
17 identified are there any other costs that are  
18 included in that hundreds of dollars that is  
19 alleged in the complaint that it cost, allegedly  
20 costs to get an HQL?

21 A No, not that I can think of.

22 Q Let me direct your attention to paragraph

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1 26 in the complaint which is Exhibit 2. Feel free  
2 to take as much time as you need to look at it.

3 A Sure.

4 Q I'm going to direct your attention to some  
5 specific statements in this paragraph. It says  
6 near the end of the paragraph, there's a sentence  
7 five lines from the bottom that starts "Atlantic  
8 Guns' customers routinely expressing interest in  
9 purchasing." Do you see that sentence?

10 A Yes, I do.

11 Q It continues -- well, I'll start from the  
12 beginning. "Atlantic Guns' customers routinely  
13 express an interest in purchasing handguns, but  
14 Atlantic Guns cannot sell them handguns because of  
15 the HQL requirement," and then the next sentence,  
16 "Many of these customers are deterred from  
17 completing the HQL application process because of  
18 the expense and inconvenience of the HQL  
19 application process and its constituents parts."  
20 As Atlantic Guns' designee can you identify any  
21 potential customers of Atlantic Guns that have  
22 been deterred from completing the HQL application

1 process because of the expense and inconvenience  
2 of the HQL requirements?

3 A Are you asking me can I identify them by  
4 specific name?

5 Q Correct.

6 A No, I cannot.

7 Q Going back up in the same paragraph it  
8 says that, this is about halfway down, it says,  
9 "Atlantic Guns has suffered and continues to  
10 suffer." Do you see that?

11 A Mm-hmm.

12 Q Yes?

13 A Yes, I do.

14 Q "Atlantic Guns has suffered and continues  
15 to suffer a significant reduction in business in  
16 a" -- excuse me -- "a significant reduction in its  
17 business due to the HQL requirement." What  
18 evidence does Atlantic Guns have that it has  
19 suffered and continues to suffer a significant  
20 reduction in business as a result of the HQL  
21 requirement?

22 MR. HANSEL: Objection. Form.

1           A   We -- the -- our handgun sales have  
2           suffered after the 2013 law went into effect.  
3           We -- the number of firearm, handguns specifically  
4           that we're selling has declined at both our  
5           locations due to the law.

6           Q   And what evidence do you have that  
7           demonstrates those assertions?

8           MR. SWEENEY:  Objection.

9           MR. HANSEL:  Objection as to "evidence."

10          A   Sales figures.  We have also -- we have a  
11          count of the number of firearms that we've sold,  
12          of handguns that we've sold that would also bear  
13          that out.

14          Q   And we'll get into that in a second.  Is  
15          there anything else other than the number of  
16          handguns sold at your stores that demonstrates  
17          that Atlantic Guns has suffered and continues to  
18          suffer significant reduction in business due to  
19          the HQL law?

20          A   Not that I can think of.  That's the  
21          primary factor that we would use to judge that.

22          Q   And does Atlantic Guns have any evidence

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1 that the reduction in handgun sales at your stores  
2 was caused exclusively by the HQL requirement and  
3 not by anything else?

4 MR. HANSEL: Objection.

5 A I don't have any factual basis for that,  
6 no.

7 Q Can you quantify the reduction in business  
8 that you contend Atlantic Guns has suffered as a  
9 result of the HQL law?

10 MR. SWEENEY: Objection.

11 A I can quantify it, and I believe it is in  
12 one of the exhibits that we have that shows both a  
13 revenue figure and a total number of handguns sold  
14 by specific years, I believe from 2010 through  
15 2017.

16 Q All right. But -- and so you can't tell  
17 me without looking at the documents?

18 A I don't remember exactly in my head  
19 exactly.

20 Q All right. Well, we'll look at those in a  
21 bit. Right now I'm just trying to get what you  
22 can tell me without looking at the documents.

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1 discovery from your attorney. Can you tell me  
2 what this is?

3 A It is a document that we prepared,  
4 Atlantic Guns prepared to give to our customers  
5 that give information about the Handgun  
6 Qualification License, what is required to obtain  
7 a qualification, a Handgun Qualification License.

8 Q So this is something that you give out to  
9 potential customers when they make inquiry about  
10 what they need to do to get an HQL; is that right?

11 A That is correct.

12 Q And this was prepared -- who -- did you  
13 prepare this?

14 A I had a hand in preparing it. I can't say  
15 that I was the one that solely prepared it. I  
16 think it was we prepared this probably several  
17 years ago, maybe have updated it. Some of my  
18 employees may have also worked on it. That I  
19 cannot remember.

20 Q Other than providing the information on  
21 Exhibit 32 is there anything else that Atlantic  
22 Guns does to provide assistance to customers or



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1 potential customers concerning the HQL process?

2 A Yes. Of course it's in our best interest  
3 to qualify as many people or have qualified as  
4 many people as possible to enable them to purchase  
5 a handgun from us. So, yes, we assist in any way  
6 we possibly can. In fact at the bottom of this  
7 Exhibit 32 we note that if you're having trouble  
8 with this process, Atlantic Guns would be happy to  
9 help you at either one of our stores, and we do  
10 this frequently by helping customers to navigate  
11 the State Police's system explaining the process,  
12 going through the process.

13 We have a number of elderly customers that  
14 can't navigate computers, that are not computer  
15 literate, and if we were not able to help them,  
16 they would not be able to purchase a handgun  
17 because they would not be able to get the HQL, and  
18 that is also true with the process for the 77R  
19 which is also automated as of 2017.

20 Q Can you identify by name any elderly  
21 customers that you contend would not be able to  
22 get an HQL because they're not computer literate

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1 but for the assistance of Atlantic Gun?

2 A I cannot.

3 Q Has Atlantic Guns had any communications  
4 with, any verbal communications with the Maryland  
5 State Police concerning the HQL law?

6 A Since the law went into effect I'm sure  
7 that we have had some communication with them  
8 concerning the implementation of the law and how  
9 it affects us. I can remember one instance in  
10 particular that I was involved in that pertained  
11 to a law enforcement officer that was not a  
12 Maryland -- that was a Maryland resident but was  
13 not an officer of a Maryland agency or a federal  
14 agency that wished to purchase a handgun as an  
15 off-duty weapon. He was a DC police officer that  
16 lived in Maryland. He did not own any personal  
17 firearms. He did not have an HQL. We submitted  
18 an application which was rejected because he was  
19 not, because he was not a Maryland officer or  
20 federal officer, and we were unaware at that time  
21 that the law specifically excluded any law  
22 enforcement officer that was not in those two

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1 jurisdictions, either federally or state. That  
2 was one instance where I contacted the State  
3 Police directly myself and asked them about that,  
4 and they responded that, yes, the officer did need  
5 an HQL, and in essence, to rub salt into the  
6 wound, the officer had to take a four-hour  
7 training course to get the HQL.

8 Q And who did you talk to at the State  
9 Police about this?

10 A I cannot remember at the time. It was  
11 three, two or three, four years ago that that  
12 happened.

13 Q And do you have any specific recollection  
14 of what this person that you spoke to at the  
15 Maryland State Police said other than what you've  
16 already told me?

17 A Just that it, that the law was,  
18 specifically stated that the only law enforcement  
19 officers that were exempt from having an HQL were  
20 ones that were an officer of a Maryland law  
21 enforcement agency or federal law enforcement  
22 agency.

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1           Q   And can you identify by name this DC  
2 police officer who had to go get the HQL?

3           A   I could. It would take some time to do it  
4 because he ended up getting an HQL which he was  
5 very upset about. I remember distinctly that it  
6 was an officer in DC that -- I mean this goes back  
7 three, four years. He was attacked in his cruiser  
8 by a man wielding a hammer and was beaten pretty  
9 badly. It made the news. He came in the store to  
10 get an off-duty firearm because he was, you know,  
11 I guess afraid for himself and wanted an off-duty  
12 weapon to keep at home as a Maryland resident.

13          Q   Right. But my question is sitting here  
14 today can you identify this officer by name?

15          A   I cannot.

16          Q   Do you have any recollection -- as  
17 designee of Atlantic Guns, are you aware of any  
18 other verbal communications with the Maryland  
19 State Police concerning the HQL other than what  
20 you've already described?

21          A   Myself personally, no, I cannot.

22          Q   Well, I'm asking you also as a designee of